

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

YURI Y. CABALLERO,

Plaintiff,

v.

OCEANS FLEET FISHERIES, INC.,
BLUE HARVEST FISHERIES, LLC,
and OCEAN GOLD, INC.,

Defendants.

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CIVIL ACTION NO.
1:20-cv-11489-LTS

JOINT MOTION TO EXTEND DEADLINES BY 120 DAYS

NOW INTO COURT, through undersigned counsel, come Ocean Gold, Inc. and Yuri Y. Caballero (“Caballero”) (collectively referred to hereinafter as “the Parties”) respectfully request that the deadlines outlined in the December 15, 2020 Scheduling Order (Doc. 13) be extended by 120 days.

The undersigned counsel have strived to conduct discovery in accordance with the Court’s scheduling order (Doc. 13). Nonetheless, discovery in this case is still ongoing and the parties need to take depositions. Additionally, counsel for Caballero recently learned that his retained liability expert, John Pierce, died unexpectedly in late August. Consequently, Caballero will require additional time to vet and secure a new liability expert. That process will require relief from the current pre-trial deadlines. In light of the foregoing, the parties jointly request that this Court grant a continuance of the pre-trial deadlines, including discovery and expert deadlines, for 120 days.

WHEREFORE, given that discovery in this case is ongoing and the unexpected passing of Caballero’s liability expert, the parties jointly request that after due consideration, this Honorable Court extend the discovery deadlines outlined in the December 15, 2020 Scheduling Order (Doc 13) for a period of 120 days or to a date convenient to the Court.

Respectfully submitted,

ARNOLD & ITKIN LLP

/s/ Joseph McGowin

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Counsel for Defendant Ocean Gold, Inc.

CERTIFICATE OF SERVICE

I, the undersigned counsel of record for Yuri Y. Caballero, do hereby certify that I have this day served the above and foregoing on all counsel of record via ECF document filing system and email, this 1st day of October, 2021.

/s/ Joseph McGowin

Joseph McGowin